

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 24-CR-20343-KMW/Goodman

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROGER ALEJANDRO PIÑATE MARTINEZ,

Defendant.

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**DEFENDANTS' REPLY IN SUPPORT OF  
JOINT MOTION TO CONTINUE DEADLINES**

The government has no objection to Roger Piñate's and Jorge Vasquez's joint motion to continue the deadline for the submission of dispositive motions. *See* (ECF No. 119) at 2 ("To the extent that the defendants seek 30 days for additional time to prepare dispositive motions, the government does not object."). As Mr. Piñate and Mr. Vasquez do, in fact, require additional time to prepare dispositive motions, they respectfully ask that the Court continue the current Friday deadline until April 28, 2025,<sup>1</sup> and grant the government until May 19, 2025 to file its responses.<sup>2</sup> A copy of a proposed order is attached as Exhibit A.

Dated: March 24, 2025

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<sup>1</sup> A thirty-day extension would fall on Sunday, April 27, 2025, making the motions due the following day. *See* Fed. R. Crim. Pro. 45(a)(1)(C).

<sup>2</sup> The current scheduling order (ECF No. 72) afforded the government 21 days to file its responses, which—if the extension were granted—would fall on May 19, 2025.

Respectfully submitted,

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Piñate Martinez*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed via electronic filing using the CM/ECF system with the Clerk of Court which sent an e-mail notification of such filing to all CM/ECF participants on March 12, 2025.

/s/ Curtis B. Miner  
Curtis B. Miner, Esq.